

## ***FF.6 Federal Facility Removal or RCRA Interim/Stabilization Measure (ISM) Starts***

### **Section 1 - Program Activity Information**

1.1      Program Activity: FF Removal or RCRA Interim/Stabilization Measures (ISM) Starts

1.2      Program Activity Category: GPRA Annual Performance Measure

1.3      Program Area: Federal Facility

1.4      EPA Sponsor:

Subject Matter Expert	Subject Area	Phone #
Josh Barber	Federal Facility	(703) 603-0265

### **Section 2 - Problem/Decision Objective**

2.1      Problem: Removal actions are defined as the cleanup or removal of released hazardous substances from the environment, and the necessary actions taken in the event of the threat of release of hazardous substances into the environment. RCRA Interim/ Stabilization Measures (ISMs) are defined as RCRA removal actions that are intended to abate threats to human health and the environment from releases and/or to prevent or minimize the further spread of contamination while long-term remedies are pursued. Regions need to report removal actions conducted in response to emergency, time-critical, and non-time critical situations at BRAC non-NPL or NPL sites. Under the Defense Environmental Restoration Program (DERP), DoD is required to notify EPA of its removal actions.

2.2      Stakeholder(s): Headquarters Remedy staff, Regional IMCs, RPMs, Site Managers, Congress and the Public.

2.3      Decision-maker(s): EPA Regions are responsible for data entry into WasteLAN for removal action information based on materials provided by the responsible Federal agency. Users with roles that allow data entry on the project schedule are permitted to enter the required data for these decisions.

2.4      Decision: Track the number of Removal/ISMs started within the reporting period as well as whether the Removal action is being conducted as emergency, time-critical, or non-time critical. The FF Removal/ISM start date is defined as the date that the Federal agency begins actual on-site removal work, or the date of the Action Memorandum signature, or the date that the lead Federal agency provides notice to EPA, or other decision document signature/approval. This date is reported in WasteLAN as the actual start date (Actual Start) of the removal (Action Name = FF Removal), ISM (Action Name = RCRA Interim/Stabilization Measure). The GPRA measure counts the number of FF Removals/ISMs with an actual start within the reporting time period.

### Section 3 - Information Needs

Name	Source	System	Table/Column
Site ID	WasteLAN	WasteLAN	Site.Site_Id
Removal or ISM	Signed Action Memorandum, letter from Federal Agency notifying EPA, Signed/approved decision document, memo to file documenting on-site removal	WasteLAN	uaction.rat_code, act_code_id where rat_code = 'LV' or 'MY'
Action Anomaly Code	Takeover documentation	WasteLAN	uaction.raa_code <> 'PS' OR 'PB' OR 'TN' OR 'TT' OR 'OA' OR 'OS'
Actual Start	Signed Action Memorandum, letter from Federal Agency notifying EPA, Signed/approved decision document, memo to file documenting on-site removal	WasteLAN	uaction.act_actl_strt_date within user selected range
Lead	WasteLAN	WasteLAN	uaction.ralt_code where ralt_code = 'FF'

### Section 4 - Scope/Universe

This information product addresses only Federal facility BRAC sites with FF Removal and ISM starts entered into WasteLAN.

### Section 5 - Data Quality Requirements

- 5.1 **Completeness:** In order to receive credit for the GPRA goal, either an FF Removal or RCRA Interim/Stabilization action must be entered on the project schedule with an actual start date within the reporting period.
- DQO applies to all Federal facilities BRAC sites in CERCLIS
- 5.2 **Accuracy:** The actual start date for an FF Removal/ISM is defined as the date that the Federal agency begins actual on-site removal work, or the date of the Action Memorandum signature, or the date that the lead Federal agency provides notice to EPA, or other decision document signature/approval. This start date entered in WasteLAN as actual start should match the documentation in the file represented by the signed Action Memorandum, letter from Federal Agency notifying EPA, signed/approved decision document, memo to file documenting on-site removal.
- Most Accurate - Data reported in official decision source document
- 5.3 **Timeliness:** This measure is based on the FF Removal and ISM actions. Therefore, its timeliness is dependent on that required for those actions. The HQ data sponsor reviews the data for this DQO semi-annually and contacts the appropriate regional staff to address any outstanding issues. Although the GPRA measure is counted at fiscal year end, the action data should be entered in a timely basis (within 5 working days of actual start/completion/signature of decision documentation).

- 5.4 Consistency: There are clear national definitions and guidance. Guidance on this measure is available in the Superfund Program Implementation Manual.  
Most Consistent - National Guidance and definitions have been distributed

## **Section 6 - Information Collection and Reporting**

- 6.1 Source for the information: Signed Action Memorandum, letter from Federal Agency notifying EPA, Signed/approved decision document, memo to file documenting on-site removal
- 6.2 User interface: User enters actions and actual completion dates for FF Removal starts and ISM starts.
- 6.3 System transfers: This information is snapshot from region to Headquarters. This data is extracted from CERCLIS and provided to E-FACTS.
- 6.4 Internal outputs: SCAP-14 Federal Facility; Federal Facility Accomplishment Report.
- 6.5 Audit reports: Federal Facility Audit Report
- 6.6 External outputs: Reported annually to Congress, E-FACTS.
- 6.7 Guidance documentation:
- ▶ Superfund Program Implementation Manual (SPIM) – OSWER Directive 9200.3-14-1G-Q